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March 7, 2024

VIA ELECTRONIC COURT FILING

Hon. Victoria Reznik
U.S. Magistrate Judge
Southern District of New York
300 Quarropas Street,
White Plains, NY 10601-4150

Re: *The Wave Studio, LLC v. General Hotel Management, Ltd., et al.*
Case No. 7:13-cv-09239-CS-VR and Related Case No. 7:15-CV-03420

Dear Judge Reznik:

We represent Defendant American Express (“American Express”) in the above-captioned matter. This letter is submitted in accordance with the Court’s March 1, 2024 Order, which directed the Defendants to provide insurance information, or objections to the production of insurance information, by March 7, 2024.

In line with the Court’s Order, we have worked diligently to determine any insurance coverage. We have determined that there is potentially insurance coverage and have reached out to potential insurers, but we have yet to receive a response. Despite its best efforts, American Express has not yet been able to determine whether there is any applicable insurance coverage to disclose, and therefore respectfully requests additional time to seek out and provide this information.

Sincerely

/s/ Erica E. Holland

Erica E. Holland

Cc: All counsel of record, via ECF